

### **Remarks**

In response to the Final Office Action mailed on April 28, 2006, the Applicant respectfully requests reconsideration based on the above claim amendments and the following remarks. It is respectfully submitted that entry of the above amendments is proper under 37 C.F.R. § 1.116 in that the amendments (1) place the claims in condition for allowance or, if necessary, in better condition for consideration on appeal; and (2) do not raise any new issues requiring further consideration or search. For the reasons given above, entry of the above claim amendments under 37 C.F.R. § 1.116 is respectfully requested.

In the present application, claim 24 has been amended to correct typographical and/or grammatical errors. No new matter has been added. It is respectfully submitted that the subject matter in the aforementioned claim amendments has previously been presented and thus does not raise new issues or require further consideration and/or search.

In the Office Action, claims 1-9 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Sanschagrín et al. (US 6,295,540, hereinafter “Sanschagrín”) in view of Farris et al. (US 5,881,131, hereinafter “Farris”) in view of Gau et al. (US 5,910,803, hereinafter “Gau”) in view of Austin et al. (US 5,500,934, hereinafter “Austin”) and further in view of Crawford (“Windows 2000 Pro: The Missing Manual”). Claims 10-29 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Sanschagrín in view of Gau in view of Austin in view of Farris and further in view of Crawford.

### **Claim Rejections - 35 U.S.C. §103**

#### **Claims 1-9**

Claims 1-9 are rejected as being unpatentable over Sanschagrín in view of Farris, Gau, Carley, Austin, and Crawford. The rejection of these remaining claims is respectfully traversed.

Independent claim 1 specifies a method of managing telephone network facilities. The method includes accessing a first computer having LEIS loaded thereon; extracting from LEIS information from a plurality of first tables, the information being in the form of individual records with each record including a field that includes a wire center identifier, the records specifying slots per piece of equipment, equipment per location, locations per wire center; formatting the extracted information into a pipe-delimited flat file, compressing the flat file, tarring the flat file, and porting the compressed and tarred information of the flat file to a second computer by a file transfer protocol; loading, from the second computer, the information of the compressed and tarred flat file into a relational database by untarring and uncompressing the flat file and storing the information from the table such that the information of the relational database is organized according to the wire center identifier of each of the records; manipulating the relational database to populate a plurality of second tables with data representative of telephone network facilities where such second tables are organized by wire center; and displaying at least a portion of the data in the second tables via a graphical user interface, the graphical user interface providing a prompt for a district wherein multiple wire centers exist for each district, and in response to receiving a district, listing the available wire centers for the district, and upon receiving a selection of the available wire centers, accessing the information from the relational database based on the wire centers selected to thereby display for each selected location of the wire center that is selected the individual pieces of equipment, the T1 circuits available, the T1 circuits working, the total T1 circuits, the ADSL circuits available, the ADSL circuits working, and the total ADSL circuits, with the information of each location being displayed in a separate window, and with the windows of the locations being cascaded.

It is respectfully submitted that the combination of Sanschagrín, Farris, Gau, Carley, Austin, and Crawford fails to teach, disclose, or suggest each of the features specified in amended independent claim 1. For example, the cited references fail to disclose storing information from a table such that the information of a relational database is organized according to a wire center identifier of the individual records. In the Office Action, it is alleged that this feature is disclosed by Sanschagrín at col. 7, lines 11-30. Sanschagrín discloses improving the database accuracy of a telecommunications based inventory system by providing verification and automatic updates so that the inventory data is aligned with a record keeping system (col. 2, line 48 through col. 3, line 3). At col. 7, lines 11-30, the reference describes a compare/update logic model which determines a discrepancy type by comparing data returned from TIRKS and an integrated network management/manager (INM). The comparison is effected on a slot-by-slot basis to determine plug-in existence or not, if HECI is the same or different, circuit ID existence in the INM, and slot status (working or not working). The logic module further determines a record update processing required using an update rules table which allows a user to specify which discrepancy types are candidates for auto-updates, and determine whether a work order record details (WORD) should be sent using a user specific parameter. It is respectfully submitted that there is not teaching or suggestion of the storage of information from a table such that the information of a relational database is organized according to a wire center identifier of the individual records. For example, the Office Action references col. 4, lines 54-56 for allegedly teaching a wire center identifier (i.e., location/relay rack terminal identification or TID). However, even assuming arguendo that a TID represents a wire center identifier, there is no teaching of a TID or any other identification information which is used to organize information in a relational database, as specified in claim 1. Instead, Sanschagrín merely teaches

that the use of a compare/update logic module to update a record table without regard to how information is organized in a relational database. Moreover, although Sanschagrín does describe identifier-based queries being performed (see col. 7, lines 61), none of the queries described therein discloses organization according to a wire center identifier of individual records in a relational database. Thus, Sanschagrín fails to disclose the aforementioned feature as specified in claim 1.

Farris, relied upon to cure the deficiencies of Sanschagrín, merely discloses maintaining the existing connections and/or identifications to customer facilities for a particular location, and thus also fails to disclose the aforementioned feature specified in claim 1. Gau merely discloses a network mapping tool for organizing and displaying topological data, and thus also fails to disclose the aforementioned feature specified in claim 1. Carley merely discloses sending a notification when multiple users attempt to alter the same data in a health care environment, and thus also fails to disclose the aforementioned feature specified in claim 1. Austin merely discloses providing an interface between a computer and a computer user to provide comprehensive information to support a customer's tasks with minimal impact on real time processing, and thus also fails to disclose the aforementioned feature specified in claim 1. Finally, Crawford merely discloses manipulating multiple windows using a taskbar, and thus also fails to disclose the aforementioned feature specified in claim 1.

As an additional example, another feature not which is not taught, disclosed, or suggested by the combination of Sanschagrín, Farris, Gau, Carley, Austin, and Crawford is the displaying of information of each wire center location in a separate window, as specified in claim 1. In the Office Action, Crawford is relied upon for allegedly teaching the aforementioned feature. However, as discussed above, Crawford merely discloses the manipulation of multiple

windows with a taskbar. In particular, as shown in Fig. 4-4 of Crawford, multiple windows are displayed, with each window representing an open computer program. Furthermore, the contents in the foreground window list a directory of multiple files stored in multiple locations on a computer system. This is not the same as the aforementioned feature of claim 1 in which information for each wire center location (e.g., a single location) is displayed in its own separate window. Thus, as shown in Crawford, the information displayed in the window includes various different categories and types of information (i.e., Fax and Security folders, word processing documents, and pictures), while the information displayed in each of the windows specified in claim 1 is related to a single (i.e., the same) wire center location. Based on the discussion above, it is respectfully submitted that Sanschagrín, Farris, Gau, Carley, and Austin, alone or in combination, also fails to disclose the aforementioned feature.

Based on the foregoing, claim 1 is allowable and the rejection of this claim should be withdrawn. Claims 2-9 depend from claim 1 and specify at least the same features. Therefore, these claims are also allowable for at least the same reasons discussed above with respect to claim 1. In addition, it is respectfully submitted that claim 6 specifies additional features which are also not taught, suggested, or disclosed by the cited references of record. In particular, claim 6 specifies simultaneously displaying at least two of location information, multiplexer capacity, ADSL capacity, equipment location, slot information, circuit information and system information. In the Office Action, this feature is allegedly disclosed by Sanschagrín at col. 6, lines 10-17. However, a close reading of this section indicates that at most, only one of the types of information described in the above list is disclosed by the reference (i.e., slot ID). Moreover, even if Sanschagrín does disclose or suggest one or more of the other types of information (i.e., location information, multiplexer capacity, ADSL capacity, equipment location, circuit

information and system information) there is no disclosure that any two of these types of information are simultaneously displayed, as specified in claim 1. The remaining cited references also fail to teach, disclose, or suggest this feature based on the discussion above. Accordingly, the rejection of claims 1-9 should be withdrawn.

#### Claims 10-29

In the Office Action, claims 10-29 are rejected as being unpatentable over Sanschagrin in view of Gau in view of Austin in view of Farris and further in view of Crawford. The rejection of these claims is respectfully traversed.

Independent claims 10, 17, and 24 recited similar allowable features as found in claim 1, discussed above. For example, claims 10, 17, and 24 each specify at least one of organizing information based on a wire center identification for individual records and the displaying of information of each wire center location in a separate window. As discussed above, the combination of Sanschagrin, Farris, Gau, Austin, and Crawford fail to teach, disclose or suggest these features. Therefore, these claims are also allowable and the rejection of these claims should be withdrawn for at least the same reasons. Claims 11-16, 18-23, and 25-29 depend from claims 10, 17, and 24 respectively. Therefore, these claims are also allowable for at least the same reasons. Accordingly, the rejection of these dependent claims should also be withdrawn.

#### **Conclusion**

In view of the foregoing amendments and remarks, this application is now in condition for allowance. A notice to this effect is respectfully requested. If the Examiner believes, after this amendment, that the application is not in condition for allowance, the Examiner is invited to call the Applicant's attorney at the number listed below.

No fees are believed due. However, please charge any additional fees or credit any overpayment to Deposit Account No. 50-3025.

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Respectfully submitted,

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